WYOMING OUTDOOR COUNCIL

Utah Office, 444 East 800 North, Logan, UT 84321
ph. (435) 752-2111 fax (435) 753-7447
e-mail: bpendery@pcu.net

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Mr. Brian Amme
PEIS Project Manager
BLM Nevada State Office
1340 Financial Blvd.
P.O. Box 12000
Reno, NV 89520-0006

Re: Vegetation Programmatic EIS
Vegetation Treatments Environmental Report

Dear Mr. Amme:

1 Please accept these comments on the Draft Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement and the Vegetation Treatments on BLM Lands in 17 Western States Programmatic Environmental Report.

2 BLM's preferred alternative appears to be focused on substantial expansion of the use of herbicides as a means to reduce the incidence of catastrophic fires, and perhaps to a lesser degree as a means to reduce the spread of invasive or noxious weeds. Thus, the preferred alternative appears to be focused on areas that have been subject to catastrophic fires due to cheatgrass invasion in Nevada, Oregon, Idaho, and Wyoming. This expansion of the use of herbicides is problematic for a number of reasons.

3 First, in all likelihood, the most significant cause of catastrophic wildfires on BLM lands relates to the invasion of cheatgrass into sagebrush habitats. Yet the herbicides that will be used most heavily to control weeds are effective against broadleaved plants (dicots), not grasses (monocots).[1] Thus, it is not clear to us that any real reduction in the incidence of catastrophic wildlfire can be realized unless the herbicide that is used is effective against grasses. But if the herbicide used were to also kill native grasses (such as glyphosphate does), it is not apparent to us that any real benefit will be achieved: BLM would likely just be creating ecological niches for further weed invasion.

[1] Based on information in the EIS, under the preferred alternative, 18% of the spraying will be done with 2-4-D, 15% with Picloram, and 25% with tebuthiuron. 2-4-D and Picloram only kill broad-leaved plants. Tebuthiuron is typically used to kill brush. Of the herbicides for which the heaviest use is planned, only gyphosphate (the active ingredient in Roundup®) kills grasses—it kills all vegetation indiscriminately.

Similarly, we believe there is a real issue of the "cure being worse than the disease" with what is being proposed. We would all like to reduce the incidence of catastrophic wildfires and the spread of noxious weeds, but if the herbicides that are used kill all manner of native vegetation in addition to undesirable vegetation, it is not apparent to us any real benefit is being achieved. 2-4-2, Tebuthiuron, Picloram, and glyphosphate will kill many highly desirable native species in addition to any undesirable invasives. The programmatic EIS does not appear to analyze or provide for mitigation that ensures this is not the case.

Furthermore, the following scenario is readily imaginable. An area is sprayed with herbicides killing essentially all broad-leafed vegetation, or perhaps all vegetation. Then the area is seeded to an introduced grass such as crested wheatgrass. This has been the exact scenario that has played out on BLM lands for at least the last 50 years. But the effect of this scenario is to create another monoculture of an introduced species, crested wheatgrass, which is by no means clearly an improvement over what may have been there beforehand, even if it was a noxious weed. If this scenario is possible, BLM needs to provide evidence that crested wheatgrass monocultures are a desirable change in the vegetation community. In the view of many (including many scientists), a monoculture of crested wheatgrass is as noxious and ecologically undesirable as a monoculture of cheatgrass. It certainly will have no lesser impacts on native species and native ecosystems. Again, the programmatic EIS does not appear to ensure that the result of the herbicide spraying is to not replace one introduced species with another introduced species, a pyrrhic victory at best.

BLM needs to explain more clearly what exactly will replace the invasive species it is targeting and how that will be achieved. What species will replace the invasive species, or will bare dirt or another suite of weeds or introduced species be the result? Over what time frame will this occur—will the replacement of undesirable species be immediate or occur over time, by natural revegetation? How will this change occur—will BLM actively plant native species to replace the invasives, plant other introduced species such as crested wheatgrass, or simply allow natural succession to occur? When and where will various options be used? What impact will budget limitations have on what is done? What scientific basis is there for pursuing any of these routes and claiming that they will be successful? The environmental impact statement needs to answer these questions before a proposed action can be properly chosen.[2]

BLM should revisit its preferred alternative and select an alternative that relies less on the broadcast use of herbicides and instead focuses on biological means of control and very selective use of herbicides as the means of reducing catastrophic wildfires and invasions of noxious weeds. Emphasis should be given to promoting the establishment of native plant species and communities. Furthermore, BLM should ensure that the causes of

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[2] We would also note that the Vegetation Treatments on BLM Lands in 17 Western States Programmatic Environmental Report must be subject to the National Environmental Policy Act and an environmental impact statement must be prepared. A cohesive plan for the "treatment" of six million acres of land per year is clearly a "major federal action significantly affecting the human environment" requiring an EIS to be prepared.

invasive weed invasions are addressed; as proposed BLM will only treat the symptoms of the problem, which will do little or no good.

Sincerely,

Bruce Pendery,
Staff Director